

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STANLEY ZHONG and NAN ZHONG,
Plaintiffs,
v.
THE REGENTS OF THE UNIVERSITY
OF WASHINGTON,
Defendant.

Case No. 2:25-cv-00348-JLR

JOINT STIPULATED MOTION AND
[PROPOSED] ORDER TO AMEND
SCHEDULING ORDER

1. Pursuant to Local Civil Rule 7(j), and after conferring, Plaintiffs Stanley Zhong and Nan Zhong (“Plaintiffs”) and Defendant the Regents of the University of Washington (“Defendant” or “UW” and, together with Plaintiffs, the “Parties”) jointly move the Court to amend its May 28, 2025, scheduling Order and its July 7, 2025, Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement in light of Plaintiffs’ intention to file an amended complaint (the “First Amended Complaint” or “FAC”). The Parties have conferred and believe the proposed schedule below will conserve the resources of the Parties and the Court and help to efficiently resolve this matter.

BACKGROUND

2. Plaintiffs served their original complaint on April 15, 2025.

3. On May 15, 2025, Plaintiffs moved to drop then-Plaintiff SWORD, which motion the Court granted on June 2, 2025.

4. On May 27, 2025, the Parties jointly moved for an extension of the deadlines for Defendant’s response to the initial complaint to July 16, 2025, which motion the Court granted on May 28, 2025.

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5. Defendant filed its Motion to Dismiss pursuant to Rules 12(b)(1) and 12(b)(6) on July 16, 2025.

6. On July 7, 2025, the Court ordered the Parties to participate in a Rule 26(f) Conference by July 21, 2025, file Initial Disclosures by August 4, 2025, and file a Combined Joint Status Report and Discovery Plan (“Status Report”) by August 11, 2025.

7. The Parties held their Rule 26(f) conferral on July 14, 2025, and thereafter exchanged drafts of the Status Report.

8. On July 23, 2025, Plaintiffs informed Defendant it intended to file a FAC by right, that the FAC would include new allegations, and that Plaintiffs continued to investigate whether additional entities should be added as parties to the litigation. The Parties thereafter conferred and agreed to the below proposed schedule (which incorporates dates already agreed-to in the Parties draft Status Report).

STIPULATION

Event	Date
Deadline to file First Amended Complaint	August 6, 2025
Deadline to hold second conferral regarding Status Report	August 13, 2025
Deadline to answer or otherwise respond to the FAC	September 3, 2025
Deadline to oppose motion to dismiss	September 24, 2025
Deadline to file Initial Disclosures	September 29, 2025
Deadline to file Status Report	October 8, 2025
Deadline to add parties	October 13, 2025
Deadline for reply in support of motion to dismiss	October 15, 2025
Start of discovery	30 days after decision on motion to dismiss or after answer filed, whichever comes first

9. The Parties request the above-proposed schedule to allow Defendant sufficient time to investigate Plaintiffs’ new allegations and to allow Plaintiffs sufficient time to determine whether to add additional entities as parties.

10. The above-proposed schedule is sought in good faith and not for the purposes of

1 delay. The requested schedule will not prejudice any of the Parties involved in the case, and the
 2 Parties anticipate the requested schedule will allow the Parties to reach the close of pleading
 3 more efficiently.

4 WHEREFORE, for the foregoing reasons, the Parties jointly respectfully request that
 5 this Court amend its scheduling order as set forth herein.

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 7 Respectfully submitted this 25th day of July 2025.

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16 *Plaintiffs*

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[PROPOSED] ORDER

For the reasons set forth above, and finding good cause, the Court hereby grants the Parties' Joint Stipulated Motion to Amend Scheduling Order.

Dated: _____

The Honorable James L. Robart
United States District Judge

DECLARATION OF SERVICE

I hereby certify that I caused the foregoing motion to be served on all parties registered for e-service in this matter via the Court's e-filing platform, and, per the Parties' agreement, via email.

Dated: July 25, 2025

s/Robert M. McKenna
Robert M. McKenna